



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 2, 2015

Nicole Cochran
Agent for Douglas Products and Packaging Company
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Label Amendment to add application use directions for storm lines/drains
Product Name: Sanafoam Roo-PRU
EPA Registration Number: 1015-73
Application Date: December 11, 2014
Decision Number: 498691

Dear Ms. Cochran:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Beth Benbow by phone at 703-347-8072, or via email at Benbow.bethany@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish
Acting Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

[Optional text appears in brackets – the final label may include some or all of the optional text]

SANAFOAM ROO-PRU

A Foaming Fumigant
 Rids Sewer [and Storm] Lines of Roots
 Will Not Harm Trees, Non-Systemic

ACTIVE INGREDIENT:	By Weight
Dichlobenil: (2, 6-dichlorobenzonitrile)	50.0%
OTHER INGREDIENTS:	<u>50.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
 (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
For additional information in case of emergency call toll free (1-800-858-7378). Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

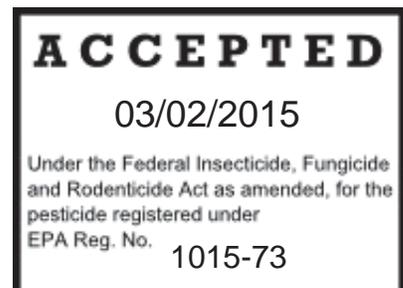
See additional PRECAUTIONARY STATEMENTS on side panels.

EPA Reg. No. 1015-73

EPA Est. No.

Manufactured for:
 Douglas Products and Packaging Company
 1550 East Old 210 Highway
 Liberty, MO 64068

Net Weight: 1.875 lb (30 oz)



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material
- Chemical-resistant apron when mixing and loading

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately, if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Toxic to fish and aquatic life. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions or at an approved waste disposal facility. Do not use in potable sewer systems. Do not use in storm, field or other drains until effluent is treated in a sanitary sewer system. Keep off lawns and plants as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination.

USE PRECAUTIONS

When used in inhabited buildings (residences, offices, hospitals, etc.) windows must be open or an exhaust fan must be operating during the application.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This package contains one-30 oz. water soluble bag for direct addition to the equipment mix tank when making foam applications of SANAFOAM ROO-PRU.

USE PRECAUTIONS AND RESTRICTIONS

Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps. Drains which may be subject to backup and flooding must be plugged. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Use a squeegee, dust pan or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid, wash area of spill or back up with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

Do not use in confined areas without adequate ventilation. Avoid any entry into manholes or confined areas. When absolutely necessary to enter these areas, be sure to use all safety protection equipment and procedures as required by law.

PRODUCT INFORMATION

SANAFOAM ROO-PRU is surface-active product for dilution in water to be used with a foaming agent [(included with this package)].

SANAFOAM ROO-PRU is a non-systemic chemical for control of roots in sewer mains and drain lines. Only the roots and organic deposits in the sewer lines are affected by SANAFOAM ROO-PRU.

SANAFOAM ROO-PRU is not to be used to treat roots in storm sewers or other drains where the wastewater will not be treated or controlled.

DIRECTIONS FOR USE OF SANAFOAM ROO-PRU WITH TANK MIX OR ON DEMAND/IN LINE MIX

1. Determine which of the collection lines have known root problems.
2. Survey Treatment Area – Confirm the line size and length. Evaluate slope, flow, lateral connections, line length, outfall, line obstructions, terrain and other field conditions. A thorough evaluation prior to starting will assure safe and accurate application of SANAFOAM ROO-PRU.
3. Determine Quantity of Foam Needed - From Table 1 compute the quantity of foam required to fill the length of pipe (in feet) to be treated.

TABLE 1 Foam Requirements and Hose Retrieval Rates for SANAFoAM ROO-PRU

Pipe I.D. (inches)	Foam Capacities (gal./ft.)	Retrieval Rate (sec./10 ft.)
4	0.7	4.2
6	1.5	9.0
8	2.5	15.0
9	3.3	20.0
10	4.1	24.0
12	5.9	36.0
15	9.2	55.0
16	10.4	62.0
18	13.2	78.0
21	18.0	108.0
24	23.5	141.0
27	29.7	178.0

Example: An 8 in. pipe requires 2.5 gallons of foam per foot to fill the pipe. Therefore, 2500 gallons of foam are required to fill an 8 in. pipe 1000 feet in length (1000 ft. x 2.5 gal./ft. = 2500 gal).

4. Measurement Directions to Produce Desired Quantity of Foam

TABLE 2 Mixing Instructions for Dilution with Foaming Agent

Foam Requirement	Total Mix Volume	Water	Foaming Agent	Sanafoam Roo-Pru
2500 gal.	125.0 gal.	123.82 gal.	1.18 gal.	30 oz. (1 water soluble bag)
5000 gal.	250.0 gal.	247.63 gal.	2.37 gal.	60 oz. (2 water soluble bags)
7500 gal.	375.0 gal.	371.46 gal.	3.54 gal.	90 oz. (3 water soluble bags)

Example: 123.82 gallons of water plus one 30 oz. bag Sanafoam Roo-Pru and 1.18 gallons of foaming agent will produce 2500 gallons of foam.

MIXING PROCEDURES: TANK MIX

1. Fill the Foamaker Equipment mix tank $\frac{1}{4}$ to $\frac{1}{2}$ full of clean water leaving room in the tank for the rinse water to be used as described below.
2. Open outer fiberboard container and remove plastic bag containing the SANAFoAM ROO-PRU.
- [3.] Remove the inner containers containing the foaming agent as needed.]
- [3 or 4]Remove the SANAFoAM ROO-PRU water soluble inner bag from their labeled protective outer plastic bag. DO NOT OPEN THE WATER SOLUBLE BAG.
- [4 or 5]Place the unopened water soluble bags through the access lid and into the water in the mix tank as needed.
- [5 or 6]Allow about 7 minutes for the bag to dissolve and the powder to thoroughly mix.
- [6 or 7]Transfer the liquid from the foaming agent container as necessary into the Foamaker solution mix tank using the suction pump system on the Foamaker.

[7 or 8]Triple rinse the foaming agent container (again using the suction pump system to add the rinse water to the mix tank).

[8 or 9]Add to the mix tank the remainder of the required water and mix thoroughly.

[9 or 10]Dispose of containers in accordance with disposal instructions.

MIXING PROCEDURES: ON DEMAND/INLINE MIX

1. Fill the Dichlobenil mix tank with five gallons of water.
2. Open outer fiberboard container and remove plastic bag containing the SANAFoam ROO-PRU.
3. Remove the SANAFoam ROO-PRU water soluble inner bag from their labeled protective outer plastic bag. **DO NOT OPEN THE WATER SOLUBLE BAG.**
4. Place the unopened water soluble bag through the access lid and into the water in the Dichlobenil mix tank as needed.
5. Run the mixer on the Dichlobenil mix tank and allow 7 minutes for the bag to dissolve and the powder to thoroughly mix.
6. Place 1.18 gallons of foam concentrate in a five gallon container and fill the container with water up to the five gallon mark.
7. Connect the liquid from the 5 gallon container to the suction pump on the Foamaker.
8. Dispose of empty containers in accordance with the STORAGE AND DISPOSAL instructions below.

USE SOLUTION PROMPTLY AFTER MIXING. Wash and flush all equipment with water after each day's use.

KEEP OFF DESIRABLE LAWNS AND PLANTS. If spillage occurs on the street or other paved areas near growing plants, immediately flush the spill thoroughly with water at moderate pressure into the sewer line.

APPLICATION GUIDELINES FOR SANAFoam ROO-PRU

TO APPLY FOAM TO MAIN LINES: Insert foam discharge hose through entire section of line to be treated. Start foam generating equipment and withdraw discharge hose at a rate calibrated to fill the pipe line to capacity (as listed in Table 1), until foam appears at input manhole. Use appropriate foam application equipment designed to produce required foam volume.

You may multiply the retrieval rates in Table 1 by 1.10 to allow for some treatment of laterals (about 3-6 feet) and to allow more foam to push into cracks and broken joints.

IF TREATING A BUILDING LATERAL: Be sure foam application discharge hose is also of a specialized type and is securely positioned into and inflated in the clean-out to prevent foam overflow and/or plug blowout. Operate foam generating equipment until required amount of foam has been produced, as calculated from information in Table 1.

Do not overfill lateral.

FOAMAKER Generators are manufactured for Douglas Products to our specifications and are available from Douglas Products.

For additional information on special applications, contact sales representative of manufacturer. All application procedures must be in accordance with established methods and systems as developed by Douglas Products.

TO APPLY TO STORM LINES: Apply SANAFoAM ROO-PRU in a storm line using the foam requirements and Hose Retrieval Rates found in TABLE 1. In pipe sizes larger than 12", use the Foam Coat Nozzle. In high flow situations, mount the nozzle to a skid to ensure nozzle remains out of the flow; this will help ensure sufficient chemical is getting on the roots.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetative matter. Do not store near pet or livestock quarters. Store in a cool, dry, and well ventilated area. Do not open the protective bag outer tube until water soluble bag is needed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Plastic Bag – Remove the water soluble bag from the outer protective plastic bag before use in application equipment. Then offer for recycling if available or dispose of empty outer plastic bag in the trash as long as WSP is unbroken.

Outer Fiberboard Container and Other Containers: Nonrefillable container. Do not reuse or refill this container. Completely empty containers into application equipment. Then offer for recycling if available, or dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

SPECIAL NOTICE

To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

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